# Department of Environmental Quality

Memorandum

**Date:** May 2, 2025

To: FILE

**Through:** Don Hanson, RG, Lead worker

Brad Shultz, Manager

Western Region Cleanup Program

From: Sarah Kingery

Western Region

**Subject:** ASTRO #207, LUST 20-95-7019; Staff Memorandum in support of a No Further

Action determination

This document presents the basis for the Oregon Department of Environmental Quality's (DEQ's) recommended No Further Action (NFA) determination for the Astro #207 site, in Eugene. As discussed in this report, contaminant concentrations in soil, groundwater, and soil vapor are below acceptable risk levels.

The proposed NFA determination meets the requirements of Oregon Administrative Rules Chapter 340, Division 122, Sections 0205 to 0360 and ORS 465.200 through 465.455.

The proposal is based on information documented in the administrative record for this site. A list of the key administrative record documents is presented at the end of this report.

## 1. BACKGROUND

#### Site location.

The site's location can be described as follows:

- Address: 925 West 6<sup>th</sup> Avenue, Eugene, in Lane County Oregon
- Latitude 44°03'12" North, Longitude 123°06'24" West
- Township 17 South, Range 3 West, Section 31, Willamette Meridian
- Tax Map Number 17033122, Tax Lot 2901.

# Site setting.

The site is currently an active automotive fueling station located at the northeast intersection of West 6<sup>th</sup> Avenue (Oregon Highway 126) and Blair Boulevard in a commercial use area of Eugene, Oregon. The lot size is 0.2 acres and is zoned community commercial. The ground surface is flat and covered by asphalt. Adams Street adjoins the site to the east (Figure 1). Adjoining property use includes a restaurant and parking lot.

# Physical setting.

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The site is a paved flat property 0.2 acres in size. The depth to groundwater at the site is typically encountered between 9 and 14 feet below ground surface (bgs). Groundwater flow direction is to the southwest towards Amazon Creek, approximately ¾ mile from the site. Soil across the site generally consists of silt and sand fill to 3 feet bgs underlain by a clay layer that varied in thickness. Sand was encountered beneath the clay and extended to the maximum depth explored of 17 feet bgs.

# Site history.

Documents submitted to DEQ indicate that the service station was purchased in 1972. There is no information on how long the service station operated prior to 1972. The service station is in operation today and there are no anticipated use changes.

## 2. BENEFICIAL LAND AND WATER USE DETERMINATIONS

#### Land use.

The site is zoned community commercial (C-2). This zone provides areas for a wide range of purchaser goods, entertainment, office and service needs. Residential uses are also permitted in this zone; however, the site has been used for retail fuel sales since at least 1972, and use is not anticipated to change. Adjacent properties are also zoned C-2. Adjacent properties include a restaurant and vacant lot.

#### Groundwater use.

Water is provided to the site and surrounding properties by the Eugene Water and Electric Board (EWEB). A beneficial Use Survey was conducted in 2017 by Robert D Miller Consulting. They confirmed with EWEB that all tax lots except for those that are parking lots or vacant are supplied water by EWEB. Oregon Water Resources Records were searched for wells within 1/8<sup>th</sup> mile radius of the site. No wells were located within the searched radius.

## Surface water use.

The nearest surface water bodies are the Willamette River located 1 mile east of the site and Amazon Creek located 3/4 of a mile to the south. Both bodies of water are located outside of the area of contamination associated with the site. Stormwater from the site drains to West 6<sup>th</sup> Avenue and is collected by city storm drains.

#### 3. INVESTIGATION AND CLEANUP WORK

During an underground storage tank (UST) upgrade in 1995 a release of gasoline was discovered. This was reported to DEQ and the leaking underground storage tank file 20-95-7019 was opened. Free floating product was observed within the UST pit. Five onsite monitoring wells were installed in 1995 (MW-1 through MW-5). Monitoring wells MW-1, MW-2, MW-3, and MW-5 were decommissioned in 2016 prior to UST decommissioning. The underground storage tanks were decommissioned by removal in 2017. Monitoring wells MW-6, MW-7, MW-8, and MW-9 were installed in 2020.

A site investigation occurred in 2017 to define the lateral extent of contamination prior to soil remediation by excavation. Sixty-nine soil samples were collected from 32 borings. Borings

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were completed onsite and on adjacent tax lots 2900 and 3000. Soil samples were analyzed for gasoline-range hydrocarbons by NWTPH-Gx. Sample depths ranged from 12 to 16 feet below ground surface (bgs) except for 2 samples that were collected at depths less than 3 feet bgs.

Soil remediation by excavation occurred across the site and extended onto adjacent properties to the north of the site (tax lots 3000 and 2900, Figure 1). In 2017, approximately 5,100 tons of contaminated soil was excavated and disposed offsite: 3,000 tons were disposed of at Coffin Butte Landfill, 2,100 tons were disposed of at Short Mountain Landfill. Sixty soil samples were collected from the base and side walls of the final excavation. All the soil samples were analyzed for gasoline-range hydrocarbons (TPH-Gx). Most soil samples were also analyzed for volatile organic compounds (VOCs) by EPA Method 8260B. Four samples were also analyzed for diesel and oil-range hydrocarbons by NWTPH-Dx. Three samples were analyzed for total lead by EPA Method 6020.

Groundwater monitoring occurred between 1995 and 2022. Groundwater samples were analyzed for volatile organic compounds by EPA Method 8260. Select samples were also analyzed for gasoline and diesel and oil-range hydrocarbons by NWTPH-Gx and NWTPH-Dx, respectively; polycyclic aromatic hydrocarbons (PAHs) by EPA Method 8270 SIM, and dissolved lead by EPA Method 6020. Groundwater at the site was treated between 1995 and 2013 using several insitu methods: air sparging, magnesium peroxide well inserts, and magnesium peroxide injections. Free product was also removed from MW-5 using absorbent pads between 1996 and 1999. There are no estimates for the volume of product removed

Soil vapor on and offsite was analyzed in 2021. One sub-slab sample was obtained onsite in the service station manager office and a second soil vapor sample was obtained from the parking lot in front of the adjacent restaurant on tax lot 2900. The samples were analyzed for VOCs by EPA Method TO-15.

#### Nature and extent of contamination.

The contaminants of concern at the site are gasoline-range hydrocarbons and VOCs. VOCs detected at the site have included benzene, toluene, ethylbenzene, total xylenes, naphthalene, isopropylbenzene, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene. Soil and groundwater were contaminated across the site. Following soil and groundwater remediation the concentrations of these contaminants has decreased. Low levels of soil vapor contamination have also been detected.

Soil samples collected after soil remediation by excavation were collected at depths typically ranging from 15 to 16.5 feet bgs. A few shallow samples were also collected along the top of the excavation walls at depths ranging from 1.5 to 3 feet bgs. Contaminants of concern were not detected in these shallow soil samples. Concentrations of THP-G in most of the deeper samples ranged from non-detect to 150 milligrams per kilogram (mg/kg). Samples with higher TPH-G concentrations are discussed below. Other contaminants detected in the soil samples included diesel, benzene, ethylbenzene, and naphthalene. Diesel was only detected in one of the confirmation samples and has not been a contaminant of concern during this project.

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Besides the site, contaminated soil was also excavated from two adjacent properties (tax lots 3000 and 2900). Soil contamination was not detected in confirmation soil samples collected from tax lot 2900 except for sample 116@16 collected at a depth of 16 feet bgs. This sample, located on the southeast corner of tax lot 2900, contained TPH-G at a concentration of 174 mg/kg and naphthalene at a concentration of 1.28 mg/kg. All other contaminants of interest were not detected. Soil contamination was not detected in the confirmation samples obtained from tax lot 3000. Soil samples collected from the southern excavation wall on site, adjacent to the 6<sup>th</sup> Avenue right-of-way, did not contain concentrations of gasoline range hydrocarbons except for two samples collected from the southeast wall at depths of 14 and 15 feet bgs. Concentrations of TPH-G in these samples were 1,340 mg/kg and 4,000 mg/kg. Ethylbenzene and naphthalene were also detected in these samples at concentrations of 1.32 mg/kg and 1.15 mg/kg respectively. This contaminated zone was described by Robert D Miller Consulting, Inc. as being a 2-foot-thick sandy gravel layer approximately 33 feet wide east-west.

There are five monitoring wells currently remaining at the site. MW-8 is located in the southeast corner of tax lot 2900. The other monitoring wells, MW-4, MW-6, MW-7 and MW-9 are located onsite. Following site remediation activities, quarterly groundwater monitoring was conducted in these wells between March 2021 and March 2022. Groundwater samples were analyzed for gasoline and diesel-range hydrocarbons, RBDM VOCs and dissolved lead. Contamination was detected in groundwater samples from March 2021 from MW-4, MW-7, MW-8, and MW-9. However, analytes were not detected in groundwater samples collected from these wells for the remainder of sampling events. No contaminants were detected in samples from MW-6 and MW-7 during any of the 2021 and 2022 sampling events

Soil vapor conditions were evaluated in 2021 beneath the slab of the station manager office and in the restaurant parking lot (tax lot 2900) north of the site. Benzene was detected at both locations at a maximum concentration of 10 micrograms per cubic meter ( $\mu g/m^3$ ). Ethylbenzene was detected beneath the station manager office at a concentration of 9.7  $\mu g/m^3$ . Naphthalene was also detected beneath the office at a concentration of 14  $\mu g/m^3$ .

#### 4. RISK EVALUATION

#### Conceptual site model.

The soil, groundwater, and soil vapor have been impacted with gasoline-range petroleum hydrocarbons and their associated constituents. The source of the contamination was the UST system which was removed in 2017. Residual soil and soil vapor contamination remains at the site and on the adjacent tax lot 2900. The groundwater has been cleaned up and is no longer contaminated. Based on property use and zoning, pathways are incomplete for residential and ecological receptors. The following receptors are being evaluated:

- Commercial receptors
- Construction and Excavation workers

Pathways by which contamination could reach human receptors are soil ingestion, dermal contact and inhalation and vapor intrusion into buildings.

To evaluate human exposure to residual chemical contamination requires an assessment of the type and extent of that exposure. This is based on current and reasonably likely future site use. DEQ publishes risk-based concentrations (RBCs) for contaminants commonly encountered, for different types of exposure scenarios. These RBCs are conservative estimates of protective levels of contaminants in soil, groundwater and air. Table 1 shows potential exposure pathways and receptors for this site. Based on this, applicable RBCs are identified and used for risk screening.

Table 1. Identification of applicable RBCs, based on pertinent pathways and receptors

	Pathway	Receptor	Is pathway	Is RBC	Comments
			complete.	Executu.	Comments
		Residential and/or Urban Residential	No	No	Note 1
	Ingestion, Dermal Contact, and Inhalation	Occupational	No	No	Remaining contamination is found at depths greater than 3 feet (14-16' bgs)
		Construction Worker	Yes	No	
Soil		Excavation Worker	Yes	No	
		Residential and/or Urban residential	No	No	
	Volatilization to Outdoor Air	Occupational	No	No	Remaining soil contamination is in small zones along the property boundaries and the bulk of contaminated soil has been removed.
	Volatilization to	Residential	No	No Note 1  Remaining contaminate found at depths greate feet (14-16' bgs)  No No  Remaining soil contaminate is in small zones along property boundaries a bulk of contaminated been removed.  No No  No  No  No  No  No  No  No  No	Nata 2
	Indoor Air	Commercial	No	NA	Note 2
	Ingestion & Inhalation from Tap Water	Residential and/or Urban residential	No	No	
	1	Occupational	No	No	
		Residential	romplete? Exceeded?  No No Remarkation feet ( Yes No		
	Volatilization to	Urban residential		No	
Groundwater	Outdoor air	Occupational	No	No Note 1  Remaining contamin found at depths great feet (14-16' bgs)  No No  No Remaining soil contain is in small zones alooproperty boundaries bulk of contaminate been removed.  NA No No  No No No No No No No No No No No No No N	groundwater contamination at
	Vapor Intrusion	Residential	and/or dential No No No Remaining contaminate feet (14-16' bgs)  tion Yes No		
	into Buildings	Commercial			
	Groundwater in Excavation	Construction & excavation worker	No	No No No Remaining cor found at depths feet (14-16' bg  Yes No No No Remaining soi is in small zon property bound bulk of contambeen removed.  No N	
Soil Vapor	Intrusion into buildings	Commercial	Yes	Yes	The concentration of naphthalene slightly exceeds RBC but the calculated risk is

				within DEQ acceptable risk levels.
Ecological	Terrestrial & Surface Water	No	No	

#### Notes:

- 1. The City of Eugene allows residential on commercially zoned properties however use is not likely to change.
- 2. DEQ does not have RBCs for volatilization to indoor air from soil. However, soil contaminated with greater than 500 ppm for diesel and 80 ppm for gasoline is considered a potential VI source.

#### Contaminant concentrations.

There is no residual groundwater contamination at the site. Low levels of soil contamination remain at depth onsite and the southeast corner of tax lot 2900. Gasoline-range hydrocarbons were not detected in 45 of the 60 confirmation samples. Residual gasoline concentrations remaining in soil typically ranged from 5.78 mg/kg to 33 mg/kg. The highest concentration of gasoline was detected in one sample from the southwest corner of the property adjacent to Hwy 99, at a concentration of 14,800 mg/kg. Low levels of VOCs were detected in some confirmation soil samples, specifically benzene, ethylbenzene, naphthalene, iso-propylbenzene, and 1,2,4-trimethylbenzene. Soil vapor samples contained concentrations of BTEX, naphthalene, 1,2,4-trimethylbenzene, and1,3,5-trimethylbenzene. Naphthalene was detected at a concentration of 14  $\mu$ g/m³.

Soil		
	Maximum Concentration	
Contaminant of Concern	mg/kg	Are any applicable RBCs exceeded?
Gasoline-range hydrocarbons	14,800	Yes
Diesel-range hydrocarbons	185	No
Benzene	0.0605	No
Ethylbenzene	14.3	No
Naphthalene	25.2	No
1,2,4-trimethylbenzene	4.81	No

## Soil Gas

Contaminant of Concern	Maximum Concentration μg/m³	Are any applicable RBCs exceeded?
Benzene	1.2	No
Toluene	29	No
Ethylbenzene	9.7	No
Xylenes	69	No
Naphthalene	14	Yes
1,2,4-trimethylbenzene	48	No
1,3,5-trimethylbenzene	10	No

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#### Human health risk.

Low levels of soil contamination remain at across the site at depths of 14 to 16 feet. Only one confirmation soil sample contained a concentration of gasoline greater than the soil ingestion, dermal contact and inhalation risk-based concentration (RBC) for construction workers. This sample location is at a depth of 15 feet on the southwest corner of the site and exceeded the construction worker RBC by a factor of 1.5. The limited amount of contamination and the depth reduce the risk of exposure to construction workers to acceptable levels.

Residual offsite soil contamination is present on the southeast corner of tax lot 2900 at a depth of 13 feet. The concentration of gasoline detected in this location is below the commercial RBCs. Residual gasoline contamination in soil also remains along the southeast corner of the site along the 6<sup>th</sup> Avenue right-of-way at depths ranging from 14 to 16 feet. Contamination may extend offsite to the south beneath 6<sup>th</sup> Avenue; however remaining concentrations are below construction and excavation RBCs.

The soil vapor sample obtained from beneath the service station manager office contained naphthalene at concentration slightly above the vapor intrusion into commercial building RBC for commercial receptors, however this amount of contamination should not present an unacceptable risk to workers in the office.

Offsite soil and soil vapor concentrations are below the RBCs for commercial receptors.

## Ecological risk.

The area is fully developed or is paved within 100 feet of the impacted area. Groundwater is not impacted. There is no residual shallow soil contamination. There are, therefore, no unacceptable ecological risks identified for the site.

# 5. RECOMMENDATION

Based on sample results for soil, groundwater and soil vapor that were obtained following removal of contamination and onsite treatment, acceptable risk levels are not exceeded, and a No Further Action determination is recommended for this site. DEQ also recommends that the offsite well MW-8 be abandoned, and adjacent property owners and municipalities be provided with a notice of recommended closure prior to closing the site. The No Further Action determination should be recorded in DEQ's environmental data management system also known as Your DEQ Online (YDO) under project number 20-95-7019.

#### 6. ADMINISTRATIVE RECORD

2015-01_20-95-7019_PhaseII.pdf	
2016-01-07_20-95-7019 DEQ comments on GW report and	
workplan.pdf	
2017-06-04_20-95-7019_20dayReport.pdf	
2021-05-13_20-95-7019_Subslab Testing Report.pdf	
2021-05-13_20-95-7019_SubslabVaporTesting.pdf	

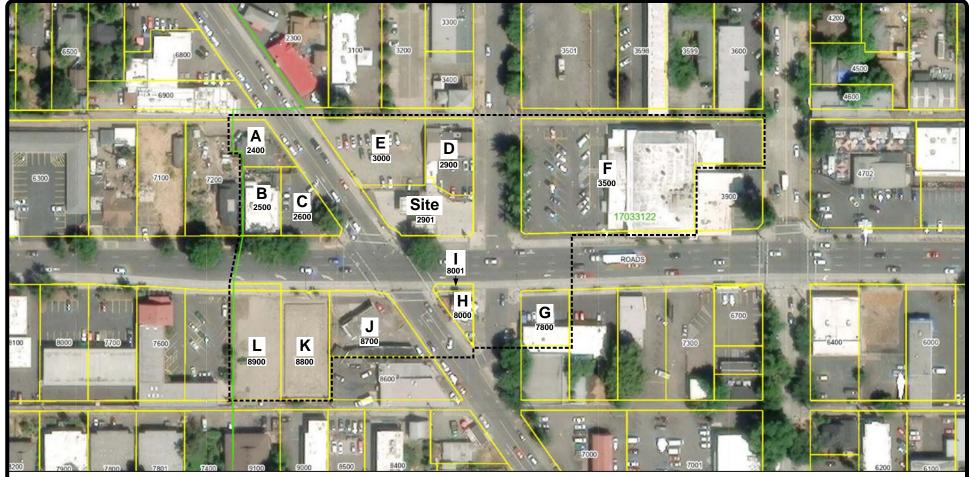
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1995-07-24_20-95-7019_USTInvInterimReport.pdf
2020-08-28_20-95-7019 Invest and CU Report Volume 1.pdf
2020-08-28_20-95-7019 Invest and CU Report Volume 2.pdf
2020-08-28_20-95-7019 Invest and CU Report Volume 3.pdf
2020-08-28_20-95-7019 Invest and CU Report Volume 1.pdf
2020-08-28_20-95-7019 Invest and CU Report Volume 2.pdf
2020-08-28_20-95-7019 Invest and CU Report Volume 3.pdf
2021-02-21_20-95-7019 Lab data.pdf
2021-03-18_20-95-7019_GW Report.pdf
2021-04-18_20-95-7019_GWMR.pdf
2021-04-30_20-95-7019 Well Replacement.pdf
2021-06-10_20-95-7019_GW Report.pdf
2021-09-23_20-95-7019_ GW Report.pdf
2021-09-23_20-95-7019_GWMR.pdf
2021-12-08_20-95-7017_GW Report.pdf
2017-03-21_20-95-7019 CMMP Revised.pdf

These documents are available through our online records management system. Additional documents are available in our paper files through a public records request.

# 7. ATTACHMENTS

- 1. Site and Surrounding Properties Map
- 2. Figure 11-Confirmation Soil Samples
- 3. Revised Data Tables (MSBA)



Adapted From: ORMAP Online Map Viewer (Accessed 6/17/24)



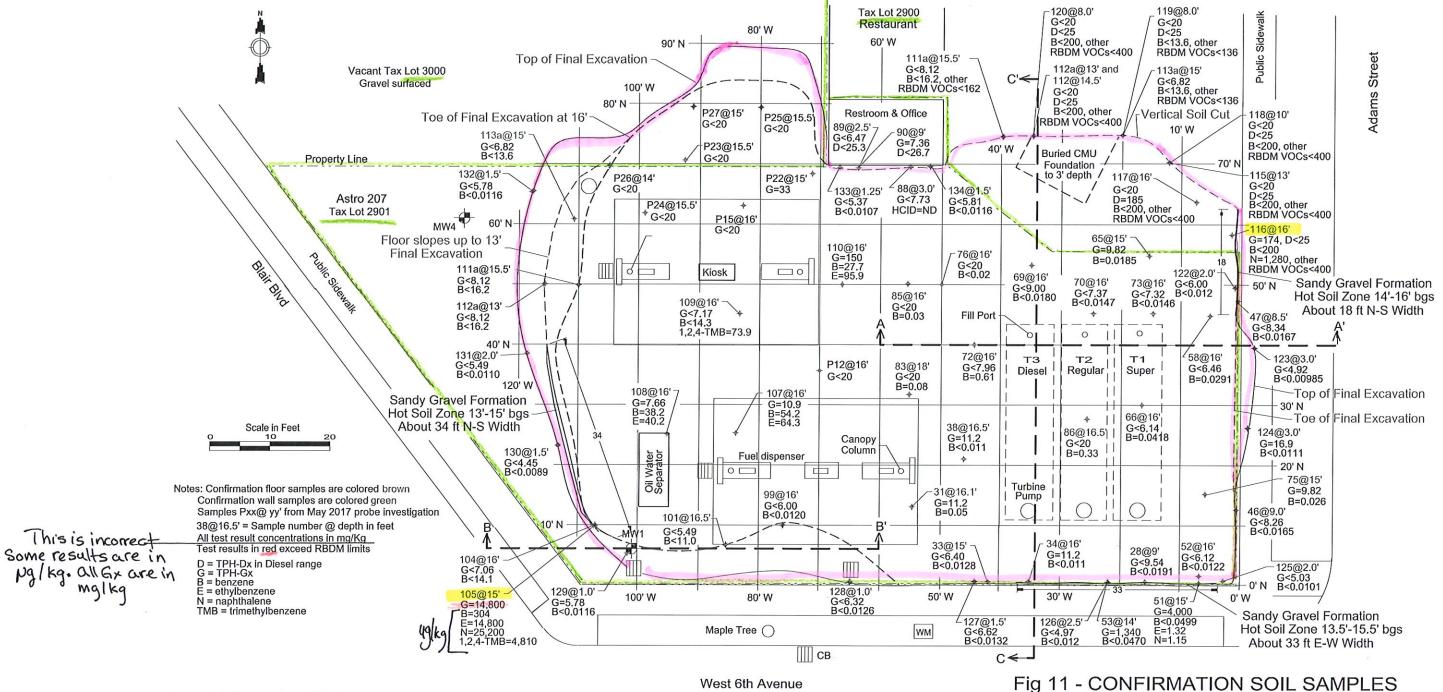
DEQ STAFF MEMO -FIGURE 1

**FIGURE** 

Martin S. Burck Associates, Inc. Geologic and Environmental Consulting Services

# SITE AND SURROUNDING PROPERTIES MAP

Astro 207 925 6<sup>th</sup> Avenue West Eugene, OR 97402 DEQ LUST No. 20-95-7019



Robert D Miller Consulting, Inc. Various soil samples collected: 4/11/17 - 9/1917 Drawn by: R D Miller, RG

--- property lines

Samples discussed in DEQ STAFF MEMO

Final excavation

Astro 207 925 West 6th Avenue Eugene, Oregon 97402 Figure Modified by DEQ-S. Kingery

A11

# **Table 1 - Preliminary Investigation Analytical Results**

Astro 207 in Eugene, Oregon

Date	Sample/Location ID	Depth in	NWTPH	NWTPH-	-Dx					Volatile	Organic C	ompounds	(VOCs)				
Collected		Feet	-Gx	Diesel	Oil	В	Т	E	Х	N	EDB	EDC	iso-PB	MTBE	1,2,4-TMB	1,3,5-TMB	
									milligrams per kilogram (mg/Kg)								
10/20/16	B1 @ 4'	4.0'	7.61	46.5	<50.0												
"	B1 @ 11'	11.0'	<8.59	<27.3	<54.7												
"	B2 @ 10.25'	10.25'	<8.23	<25.2	<50.4							-					
"	B2 @ 11.25'	11.25'	149	<27.6	<55.3	<0.0168	<0.084	<0.042	<0.126	<0.168	<0.042	<0.042	<0.084	<0.084	<0.084	<0.084	
"	B2 @ 16.25 <sup>1</sup>	16.25'	372	<25.0	<50.0	<0.0115											
10/21/16	MW2 - Cuttings <sup>1</sup>	10'-15'	1,010	68.7	61.1	0.0621	0.071	2.64	5.82	3.59	<0.0272	<0.0272	0.758	<0.0544	10.2	3.46	
"	MW3 - Cuttings	10'-15'	51.7	<25.0	160	<0.0119											
"	MW5 - Cuttings	10'-15'	31.4	<25.0	<50.0	0.0284						-					
Occupationa	ccupational Exposure Limit <sup>2</sup>			>Max	>Max	0.10	490	0.90	100	0.34	5.6x10 <sup>-4</sup>	0.013	57,000	0.54	12	110	
Construction	Construction Worker Exposure Limit 9,700 <b>4,600 11,00</b>						77x10 <sup>4</sup>	17,000	56x10 <sup>4</sup>	16,000	9.0	200	27,000	12,000	2,900	2,900	
Excavation \	Worker Exposure Lim	iit	>Max	>Max	>Max	11,000	28,000	49,000	20,000	580	250	5,600	750,000	320,000	81,000	81,000	

#### Notes:

"B" means Benzene
"T" means Toluene
"E" means Ethylbenzene

"E" means Ethylbenzene
"X" means Xylenes
"N" means Naphthalene

"EDB" means Ethylene Di-Bromide
"EDC" means 1,2-Dichloroethane
"iso-PB" means iso-propylbenzene

"1,2,4-TMB" means 1,2,4-Trimethylbenzene "1,3,5-TMB" means 1,3,5-Trimethylbenzene

Red indicates test result is above regulatory cleanup limit Blue - lab detection limit is above regularory cleanup limit

"--" means compound was not tested

"-Gx" means Gasoline extended range with overlap into Diesel range

"MTBE" means Methyl Tert-Butyl Ether

Footnote<sub>1</sub> Test results of the 8 RCRA Metals were:

Metal	Ag	As	Ва	Cd	Cr	Hg	Pb	Se
B2 @ 16.25'	<0.050	<0.10	<0.50	<0.05	<0.10	<0.004	<0.05	<0.10
MW2 - Cuttings	< 0.050	<0.10	<0.50	<0.05	<0.10	<0.004	<0.05	<0.10

Footnote2 Most strigent pathway for Occupational Users is Leaching to Groundwater RBDM limits in bold are most strigent of the three potential exposure limits

Table 2 - Soil Probe Investigation Analytical Results

Date	Sample/Location ID	Depth in	NWTPH-Gx		Date	Sample/Location ID	Depth in	NWTPH-Gx			Sample/Location ID	Depth in	NWTPH-Gx		
Collected		Feet	mg/Kg	1	Collected		Feet	mg/Kg	C	Collected		Feet	mg/Kg		
05/09/17	P1-1 @ 14.5'	14.5'	<20	1	05/09/17	P12-1 @ 12'	12'	90		05/12/17	P20-2 @ 16'	16'	124		
"	P1-2 @ 16.5'	16.5'	<20	1	"	P12-2 @ 14.5'	14.5'	158		05/22/17	P21-1 @ 14.5'	14'	114		
"	P2-1 @ 9.5'	9.5'	<20	1	"	P12-3 @ 16'	16'	<20		"	P21-2 @ 16'	16'	<20		
"	P2-2 @ 13'	13'	4,370	1	"	P13-1 @ 9.75'	9.75'	2,760		"	P22-1 @ 14'	14'	2,750		
"	P2-3 @ 16'	16'	<20	1	"	P13-2 @ 14'	14'	11,700		"	P22-2 @ 16'	16'	33		
"	P3-1 @ 14'	14'	731	1	"	P13-3 @ 16'	16'	2,120		"	P23-1 @ 14.5'	14.5'	<20		
"	P3-2 @ 16'	16'	<20	1	"	P13-4 @ 17'	17'	<20		"	P23-2 @ 15.5'	15.5'	<20		
"	P4-1 @ 13'	13'	1,150	1	"	P14-1 @ 2'	2'	<20		"	P24-1 @ 14'	14'	600		
"	P4-2 @ 16'	16'	<20	1	"	P14-2 @ 10'	10'	10,900		"	P24-2 @ 15.5'	15.5'	<20		
"	P5-1 @ 13'	13'	<20	1	"	P14-3 @ 14'	14'	2,450		"	P25-1 @ 13.5'	13.5'	6,030		
"	P5-2 @ 14'	14'	<20	1	"	P14-4 @ 16.5'	16.5'	803		"	P25-2 @ 15.5'	15.5'	<20		
"	P6-1 @ 14'	14'	<20	1	"	P15-1 @ 14.5'	14.5'	1,760		"	P26-1 @ 14'	14'	<20		
"	P6-2 @ 15'	15'	<20	1	"	P15-2 @ 16'	16'	<20		"	P27-1 @ 13.5'	13.5'	439		
"	P7-1 @ 2'	2'	<20	1	05/12/17	P16-1 @ 14.5'	14.5'	<20		"	P27-2 @ 15'	15'	<20		
"	P7-2 @ 14'	14'	<20	1	"	P17-1 @ 2.5'	2.5'	<20		"	P28-1 @ 14'	14'	28		
"	P8-1 @ 14'	14'	<20	1	"	P17-2 @ 14.5'	14.5'	135		"	P28-2 @ 16'	16'	<20		
"	P8-2 @ 16'	16'	<20	1	"	P17-3 @ 16'	16'	<20		"	P29-1 @ 15'	15'	948		
"	P9-1 @ 14'	14'	82	1	"	P18-1 @ 14'	14'	<20		"	P30-1 @ 13'	13'	5,010		
"	P9-2 @ 16'	16'	139	1	"	P18-2 @ 15'	15'	<20		"	P30-2 @ 16'	16'	57		
"	P10-1 @ 12'	12'	<20	1	"	P19-1 @ 12'	12'	170		"	P31-1 @ 11.5'	11.5'	10,600		
"	P10-2 @ 14.5'	14.5'	1,240	1	"	P19-2 @ 14.5'	14.5'	3,030		"	P31-2 @ 16'	16'	<20		
"	P10-3 @ 16'	16'	<20		"	P19-3 @ 16.5'	16.5'	<20		"	P32-1 @ 13.5'	13.5'	7,470		
"	P11-1 @ 14'	14'	165		"	P20-1 @ 14'	14'	7,360		"	P32-2 @ 16.5'	16.5'	<20		
"	P11-2 @ 16.5'	16.5'	<20												
RBDM NW	PH-Gx limit for Occu	pational Use	rs	130	Most strige	ent pathway for Occup	ational Users	s is "Leaching to	Groundwate	er"					
RBDM NWTPH-Gx limit for Construction Workers 9					Pathway for	or Construction Worke	rs is "Soil ing	jestion, Dermal (	Contact and I	nhalation"	•				
RBDM NW	PH-Gx limit for Excav	ation Worke	rs	>Max	, , , , , , , , , , , , , , , , , , ,										

Date	Sample/Location	Depth in	NWTPH-Dx								
Collected	ID	reet mg/kg									
05/09/17	9/17 P14-1 @ 2' 2' D<25 & O										
<b>RBDM NWT</b>	PH-Dx limit for Occup	ational Use	ers	14,000							
<b>RBDM NWT</b>	RBDM NWTPH-Dx limit for Construction Workers 4,600										
<b>RBDM NWT</b>	RBDM NWTPH-Dx limit for Excavation Workers >1										

#### Notes:

Red indicates test result is above regulatory cleanup limit of 130 mg/Kg Blue - lab detection limit is above regularory cleanup limit of 130 mg/Kg

"NWTPH-Gx" means Gasoline extended range with overlap into Diesel range "NWTPH-Dx" shown as individual Diesel and Oil ranges without overlap

Yellow Highlight

Indicates data was revised or added by MSBA on April 8, 2025 folowing data review

Table 3 - Soil Cleanup Analytical Results

Page 1 of 5

Date Collected		Sample ID and Location	Depth in	NWTPH	NWTPH	I-Dx				١	olatile Orga	nic Compou	ınds (VOCs	5)				Total
			Feet	-Gx	Diesel	Oil	В	T	E	Х	N	EDB	EDC	iso-PB	MTBE	1,2,4-TMB	1,3,5-TMB	Lead
											ıms per kilogr	am ( <del>mg/Kg)</del>						
04/11/17	1	3'x16'WX6'N	3'	<5.55			<0.0111	< 0.0555	<0.0278	<0.0833				-				
"	2	6'x15'Wx6'N	6'	<7.91			<0.0158	<0.0791	< 0.0395	<0.119								
"	3	4' @ T1 middle	4'	<5.63			< 0.0113	< 0.0563	<0.0281	<0.0844								
"	4 <sup>1</sup>	6' @ T1 NE corner	6'	<62.2	241	74.6	<0.0124	< 0.0622	0.414	<0.1182	22.5	<0.0622	<0.0311	1.66	<0.0622	7.36	0.809	
"	5	6.5' @ T1x15'N	6.5'	<5.28			<0.0106	<0.0528	< 0.0264	<0.0792				-				
"	6 <sup>2</sup>	4.25' @ T1x7'S	4.25'	43.6	<25.0	<50.0	<.0.0112	< 0.0561	<0.0280	<0.0841	<0.112	< 0.0561	<0.0280	< 0.0561	<0.0561	< 0.0561	<0.0561	
"	7	T1 N Bottom UST	11'	873			< 0.0123	< 0.0613	0.935	0.314							- 1	
"	8	T1 S Bottom UST	11'	116			<0.0118	< 0.059	< 0.0295	<0.0885							- 1	
"	9	T1 M Bottom UST	11'	1,410			< 0.116	<0.578	<0.289	< 0.867								14.0
"	10	8.5' @ T1 S end	8.5'	<5.56			<0.0111	<0.0556	<0.0278	<0.0834				-				
"	11	10.5' @ T1 N end	10.5'	2,980	120	<53.5	< 0.354	<1.77	<0.885	<2.65	<3.54	< 0.885	<0.885	2.64	<1.77	<1.77	<1.77	
"	12	T2 N end Bottom	11'	12,300	760	<422	<1.17	<5.85	144	<8.78	121	<2.93	<2.93	30.8	<5.85	<5.85	<5.85	10.5
"	13	T2 Middle Bottom	11'	5,140	589	656	<1.10	<5.50	40.8	<8.24	30.7	<2.75	<2.75	9.89	<5.50	<5.50	<5.50	
"	14	T2 S end Bottom	11'	10,700	1,430	<2170	<1.27	<6.36	65.2	28.2	43.8	<3.18	<3.18	16.3	<6.36	392	60	12.4
04/12/17	15	T3 S end @5'	5'	<5.43	<25.0	<50.0	< 0.0109	< 0.0543	< 0.0271	<0.0814								
"	16	T3 N end @4.5'	4.5'	265	28.6	52.9	< 0.0107	< 0.0537	0.0924	<0.0805							- 1	
"	17 <sup>3</sup>	T3 N end@6.5'	6.5'	12.2	<27.9	<55.9	< 0.0176	<0.0882	<0.0441	<0.1323	<0.176	<0.0882	< 0.0441	<0.0882	<0.0882	<0.0882	<0.0882	
"	18	N T3 Bottom	11'	5.470	314	<222	<0.147	< 0.736	34.4	8.83								
"	19	Mid T3 Bottom	11'	10,800	1.030	<209	0.807	< 0.549	177	3.42								14.4
"	20	S T3 Bottom	11'	2.410	298	88.4	0.144	< 0.627	35.5	<0.940				-				
04/13/17	21	3' @ Prod Lines	3'	<5.46	<25.0	<50.0	<.0109	< 0.0546	< 0.0273	< 0.0819								
"	22	6'x10'Nx50'W	6.0'	Discarded	- Not Teste	ed												-
"	23	6' x0'Nx50'W	6'	Discarded	- Not Teste	ed												
"	24	12' Pothole 1	12'	Discarded	- Not Teste	ed												
"	25	14' Pothole 1	14'	1,620	189	<50.0	< 0.125	< 0.626	0.707	<.939								
"	26	17' Pothole 1	17'	7.38	<25.0	<50.0	<0.0113	< 0.0567	<0.0283	<0.085								
"	27	8' x 15'N	8'	Discarded	- Not Teste	ed												
"	28	9'x16'W	9'	<9.54	<25.5	<50.9	<.0191	<0.0954	<0.0477	<0.143								
04/19/17	29	10'x3'@ of 24	10'	<10.0 <6.07	<28.8	<57.6	<0.0201	<0.100	< 0.0502	<0.151								
"	" 30 14'8" W Toe above #31 14.7'				<25.0	<50.0	<0.0121	<0.0607	<0.0303	<0.0910	<0.121	<0.0303	<0.0303	<0.0607	<0.0607	<0.0607	<0.0607	
RBDM exposure	for Occupational Users <sup>4</sup>		130	>Max	>Max	0.10	490	0.90	100	0.34	5.6x10 <sup>-4</sup>	0.013	57,000	0.54	12	110	30	
RBDM exposure limits for Construction Workers					4,600	11,000	380	77x10 <sup>4</sup>	17,000	56x10 <sup>4</sup>	16,000	9.0	200	27,000	12,000	2,900	2,900	30
RBDM exposure limits for Excavation Workers				>Max	>Max	>Max	11,000	28,000	49,000	20,000	580	250	5,600	750,000	320,000	81.000	81,000	800

#### Notes:

"B" means benzene
"T" means toluene

"E" means ethylbenzene "X" means xylenes

"EDB" means Ethylene Di-Bromide "EDC" means 1,2-Dichloroethane

"iso-PB" means iso-propylbenzene "n-PB" means n-propylbenzene

"MTBE" means methyl tert-butyl ether
"1,2,4-TMB" means 1,2,4-Trimethylbenzene
"1,3,5-TMB" means 1,3,5-Trimethylbenzene "N"
means Naphthalene

Red indicates result is above regulatory cleanup limit Blue - lab detection limit above regulatory cleanup limit

"--" means not tested

Footnote 1 Full scan of 64 VOC compounds. No chlorinated solvents or non-petroleum chemicals detected. Refer to Apex Lab Report # A7D0344 for complete list of individual compounds.

Footnote Full scan of 64 VOCcompounds. No contaminants detected. Refer to Apex Lab Report # A7D0344 for complete list of individual compounds.

Footnote <sup>3</sup> Full scan of 64 VOC compounds. No contaminants detected. Refer to Apex Lab Report # A7D0347 for complete list; including Total Lead = 14.4 mg/Kg (RBDM limit = 30 mg)

Footnote 4 Most strigent pathway for Occupational Users is "Leaching to Groundwater".

Table 3 - Soil Cleanup Analytical Results

Page 2 of 5

Date		Sample ID and Location	Depth in	NWTPH	NWTPH	-Dx					Volatile Or	rganic Comp	ounds (VOC	s)				Total
Collected		•	Feet	-Gx	Diesel	Oil	В	Т	E	Х	N	EDB	EDC	iso-PB	MTBE	1,2,4-TMB	1,3,5-TMB	Lead
			1			•				millig	rams per kilo	gram (mg/Kg) -				•		
"	31	16'2" W Toe below #30	16.1'	11.2	<25.0	<50.0	0.0543	<0.0610	< 0.0305	<0.0915	<0.122	< 0.0305	< 0.0305	<0.0610	<0.0610	< 0.0610	< 0.0610	
"	321	4' below SE dispenser	4'	<24.7	<61.8	<124												
"	33	15'x42'W (Wall)	15'	<6.40	<25.0	<50.0	<0.0128	< 0.0640	< 0.0320	<0.0960	<0.128	< 0.0320	< 0.0320	<0.0640	<0.0640	< 0.0640	< 0.0640	
"	34	16'x42'W (Wall)	16'	11.2	<25.0	<50.0	<0.0110	<0.0548	0.0373	<0.0822	<0.110	< 0.0274	< 0.0274	<0.0548	<0.0548	<0.0548	<0.0548	
"	35	11.5'xT3 so. End	11.5'	1,530			0.301	< 0.913	23.9	<1.37								
"	36	14.5'xT3 so. End	14.5'	15,500			25.5	<3.07	159	180	87.5	<1.53	<1.53	17.5	<3.07	461	76	
"	37	16'xT3 so. End	16'	258			0.2	< 0.0659	1.26	1.13	1.4	< 0.0329	< 0.0329	0.208	< 0.0659	5.32	0.823	
"	38	16.5' (below 21)	16.5'	12.4			0.0456	< 0.0530	0.0551	< 0.0795	<0.106	< 0.0265	< 0.0265	< 0.0530	< 0.0530	< 0.0530	< 0.0530	
"	39	T2 11.5'x26'Wx10'N	11.5'	2,330			<0.188	< 0.942	16.7	<1.41								
"	40	T2 11.5'x26'Wx25'N	11.5'	2,610			0.235	< 0.980	40.8	<1.47								
"	41	T2 12.5'x26'Wx10'N	12.5'	676			0.0913	<0.183	5.89	< 0.274								
"	42	T2 13.0'x26'Wx25'N	13.0'	896			0.303	<0.191	9.63	<0.287	5.09	< 0.0957	< 0.0957	1.11	<0.191	1.52	<0.191	
04/20/17	43	T1 S corner @10'	10'	1,070	483	<50.0	<0.0470	< 0.235	1.02	< 0.353								
"	44 Field Disc			Field Disca	rded - Not	Tested	-	-	-	-								
"	45	Pit Water - Refer to Table 4	•						-	_								
"	46	12'Nx0'Wx8.5'	8.5	<8.26	<26.7	<53.4	< 0.0165	<0.0826	< 0.413	<0.124	<0.165	< 0.0413	< 0.0413	<0.0826	<0.0826	<0.0826	<0.0826	
"	47	8'Sx0'Wx9'	9'	<8.34	<27.3	<54.5	< 0.0167	< 0.0834	< 0.417	<0.125	<0.167	< 0.0417	< 0.0417	< 0.0834	< 0.0834	< 0.0834	< 0.0834	
"	48			Field Disca	arded - Not	Tested			-	-								
"	49			Field Disca	arded - Not	Tested												
"	50	N wall @ 9' x 15'W	9'	952	576	<56.2	< 0.0603	< 0.301	<0.151	< 0.452	< 0.603	<0.151	< 0.151	0.353	< 0.301	< 0.301	< 0.301	
04/21/17	51	15'X7'Wx0'N	15'	4,000			< 0.0499	< 0.249	1.32	< 0.0374	1.15	< 0.499	< 0.125	0.84	< 0.249	<0.249	2.50	
"	52	16'x7'Wx3'N	16'	<6.12			<0.0122	< 0.0612	< 0.0306	<0.0918	<0.122	< 0.0306	< 0.0360	<0.0612	<0.0612	< 0.0612	< 0.0612	
"	53	14'x23'Wx3'N	14'	1,340			< 0.0470	< 0.235	0.263	< 0.352	< 0.47	< 0.117	< 0.117	0.484	< 0.235	< 0.235	< 0.235	
"	54	15'x23'Wx3'N	15'	<6.21			<0.0124	< 0.0621	< 0.031	< 0.0931	<0.124	< 0.0310	< 0.0310	<0.0621	< 0.0621	< 0.0621	< 0.0621	
"	55	11'x23'Nx25'W	11'	Lab Discar	ded - Not T	ested												
"	56	13'x23'Nx23'W	13'	98			0.0878	<0.0944	1.31	<0.142	<0.189	< 0.0472	< 0.0472	0.131	<0.0944	<0.0944	< 0.0944	
04/24/17	57	15'x45'Nx5'W	15'	<6.08			0.0194	<0.0608	< 0.0304	< 0.0911	<0.122	< 0.0304	< 0.0304	<0.0608	<0.0608	<0.0608	<0.0608	
"	58	16'x45'Nx5'W	16'	<6.46			0.0291	< 0.0646	< 0.0323	<0.0969	<0.129	< 0.0323	< 0.0323	<0.0646	<0.0646	< 0.0646	< 0.0646	
"	59	11'x54'Nx15'W	11'	1,650			< 0.0696	< 0.348	<0.174	<0.522	< 0.696	< 0.174	< 0.174	0.936	<0.348	<0.348	<0.348	
"	60	16.5'x54'Nx15'W	16.5'	<6.25			<0.0125	<0.0625	< 0.0313	<0.0938	<0.125	< 0.0313	< 0.0313	<0.0625	<0.0625	<0.0625	<0.0625	
RBDM exposure limits for Occupational Users <sup>2</sup> 130 >Max >				>Max	0.10	490	0.90	100	0.34	5.6x10 <sup>-4</sup>	0.013	57,000	0.54	12	110	30		
RBDM exposure limits for Construction Workers 9,700					4,600	11,000	380	77x10 <sup>4</sup>	17,000	56x10 <sup>4</sup>	16,000	9.0	200	27,000	12,000	2,900	2,900	30
RBDM exposure limits for Excavation Workers				>Max	>Max	>Max	11.000	28.000	49.000	20.000	580	250	5.600	750,000	320,000	81.000	81.000	800

#### Notes:

"B" means benzene "EDB" means Ethylene Di-Bromide "T" means toluene "EDC" means 1,2-Dichloroethane "E" means ethylbenzene "iso-PB" means iso-propylbenzene "X" means xylenes "n-PB" means n-propylbenzene

"MTBE" means methyl tert-butyl ether "1,2,4-TMB" means 1,2,4-Trimethylbenzene "1,3,5-TMB" means 1,3,5-Trimethylbenzene "N" means Naphthalene

Yellow Highligh Indicates data was revised or added by MSBA on April 8, 2025 following data review

Red indicates result is above regulatory cleanup limit Blue - lab detection limit is above regulatory cleanup limit "--" means not tested

Table 3 - Soil Cleanup Analytical Results

Date Collected	igene,	Sample ID and Location	Depth in	NWTPH	NWTPH-D	\					/alatila Osa	anic Compo	d= (\/OC					Total
Date Collected	Sample ID and Location		-Gx	Diesel	Oil	В	-	E		Volatile Org	EDB	EDC	iso-PB	MTBE	1.2.4-TMB	1,3,5-TMB		
			Feet	-01	Diesei	Oil		<u>'</u>	_	milliarame ner	kilogram (m	g/Kg}			WIIDE	1,2,4-11016	1,3,3-1 WID	Lead
4/24/2017	61	11'x54'Nx25'W	11.0'	15.500			<0.0969	0.989	106	308	58.9	<0.323	<0.162	13.7	<0.323	351	89.2	
"	62	11'x30'Nx15'W	11.0'	1.960			<0.0890	<0.445	3.83	<0.668	<0.890	<0.223	<0.223	2.3	<0.445	<0.445	<0.445	
"	63	11'x42'Nx15'W	11.0'	1,190			< 0.0699	< 0.350	10.1	<0.525	1.47	< 0.175	<0.175	1.89	<0.350	< 0.350	< 0.350	
"	64	64-11'x42'Nx25'N	11.0'	33.2			<0.0161	<0.0804	0.561	<0.121	0.192	<0.0402	<0.0402	<0.0804	<0.0804	<0.0804	<0.0804	
"	65	15'x54'Nx15'W	15.0'	9.82			0.0185	<0.0562	0.0646	< 0.0843	<0.112	<0.0281	<0.0281	<0.0562	<0.0562	0.171	< 0.0562	
4/27/2017	66	16'x30'Nx15'W	16.0'	<6.14			0.0418	< 0.0614	0.112	<0.0922	<0.123	<0.0307	< 0.0307	<0.0614	<0.0614	<0.0614	< 0.0614	
"	67	12'x45'Nx35'W	12.0'	<8.53			<0.0171	<0.0853	<0.0427	<0.128	<0.171	<0.0427	<0.0427	<0.0853	<0.0853	<0.0853	<0.0853	
"	68	15'x52'Nx35'W	15.0'	181			0.102	<0.0899	0.828	0.748	0.591	<0.0450	<0.0450	0.139	<0.0899	3.31	0.495	
"	69	16'x52'Nx35'W	16.0'	<9.00			<0.0180	<0.0900	<0.0450	<0.135	<0.180	< 0.0450	<0.0450	<0.0900	<0.0900	<0.0900	<0.0900	
"	70	16'x45'Nx35'W	16.0'	<7.37			< 0.0147	< 0.0737	<0.0368	<0.110	<0.147	<0.0368	<0.0368	< 0.0737	< 0.0737	0.0899	< 0.0737	
"	71	15'x40'Nx45'W	15.0'	7,090			1.25	<1.49	31.4	47.5	24.4	< 0.746	< 0.746	4.95	<1.49	142	7.68	
"	72	16'x40'Nx45'W	16.0'	<7.96			0.0605	<0.0796	0.0974	<0.119	<0.159	< 0.0398	<0.0398	<0.0796	< 0.0796	< 0.0796	<0.0796	
4/27/2017	73	16'x45'Nx15'W	16.0'	<7.32			< 0.0146	< 0.0732	0.0417	<0.110	<0.146	< 0.0366	< 0.0366	< 0.0732	< 0.0732	< 0.0732	< 0.0732	
"	74	15'x15'Nx5'W	15.0'	14.6			0.0269	<0.0927	0.089	<0.139	<0.185	< 0.0464	< 0.0464	<0.0927	< 0.0927	0.147	<0.0927	
	75	16'x15'Nx5'W	16.0'	16.9			0.0258	<0.0646	0.0749	< 0.0969	<0.129	< 0.0323	< 0.0323	<0.0646	<0.0646	0.119	<0.0646	
5/03/2017	76	16'x50Nx50'W	16.0'	<20			<0.02	< 0.30	< 0.30	< 0.60								
"	77	14.5'x50Nx50'W	14.5'	<20			<0.02	< 0.30	< 0.30	<0.60								
"	78	12'x50'Nx53'W	12.0'	15,700			6.39	< 0.30	30.16	46.22								
"	79	13'x29'Nx54'W	13.0'	Discarde	ed - Not Teste	ed												
"	80	14'x32'Nx56'W	14.0'	992			1.52	< 0.30	7.31	1.58								
"	81	16'x32'Nx56'W	16.0'	13,300			19.79	0.36	47.99	59.89					-			-
"	82	17'x32'Nx56'W	17.0'	Discarde	ed - Not Teste	ed												
"	83	18'x32'Nx56'W	18.0'	<20			0.08	< 0.30	< 0.30	<0.60								
"	84	13'x50'Nx55'W	13.0'	385			0.22	< 0.30	0.65	1.05								
"	85	16'x50'Nx55'W	16.0'	<20			0.03	< 0.30	< 0.30	<0.60								
"	86	16.5'x30'Nx25'W	16.5'	<20			0.33	< 0.30	< 0.30	<0.60								
"	87	15'x45'Nx5'W		ater - Refer														
6/26/2017	87	Intended to be 88		ater - Refer														
6/27/2017	88	3'@ Office Door	3'	<7.73	<25.0	<50.1												
	89	2.5' @ Restroom Dr.	2.5'	<6.47	<25.3	56.4												
	90	9.0' @ Restroom Dr.	9.0'	<7.36	<26.7	<53.4												
		for Occupational Users <sup>1</sup>		130	>Max	>Max	0.10	490	0.90	100	0.34	5.6x10 <sup>-4</sup>	0.013	57,000	0.54	12	110	30
RBDM exposure	e limits	for Construction Workers		9,700	4,600	11,000	380	77x10 <sup>4</sup>	17,000	56x10 <sup>4</sup>	16,000	9.0	200	27,000	12,000	2,900	2,900	30
RBDM exposure	limits	for Excavation Workers		>Max	>Max	>Max	11,000	28,000	49,000	20,000	580	250	5,600	750,000	320,000	81,000	81,000	800

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Red indicates result is above regulatory cleanup limit
Blue - lab detection limit is above regulatory cleanup limit
"--" means not tested

Page 3 of 5

Table 3 - Soil Cleanup Analytical Results

Page 4 of 5

Date Collected	Sample ID and Location	Depth in	TPH-	TPH-Gx	NWTPH-	)x				\	/olatile Orga	nic Compo	unds (VOCs	s)				Total
		Feet	HCID		Diesel	Oil	В	Т	E	Х	N	EDB	EDC	iso-PB	MTBE	1,2,4-TMB	1,3,5-TMB	Lead
		milligrams per kilogram (mg/Kg)																
6/27/2017	91 4'@NE Fuel Dispenser	4'	ND			-	-			-			-		-			
	92 4'@NW Fuel Dispenser	4'	ND															
	93 4'@SW Fuel Dispenser	4'	ND															
"	94 4'@Diesel Dispenser	4'	ND										-					
"	951 7'@Rectangular Fill	7'		40.6	<25	<50	0.0125	<0.519	<0.0259	<0.0778	<0.104	<0.0519	< 0.0259	0.0545	<0.0519	<0.0519	<0.0519	
6/27/2017	96 Pit by Office	8'		<20	<25	<100	<0.20	< 0.30	< 0.30	< 0.60								
"	97 60'Wx7'Nx13'D	13'	-	3,020	<25	<100	0.11	< 0.30	5.6	0.65		-	-		-			
6/30/2017	98 101'Wx1'Nx2.5'D	2.5'		<7.25		-	< 0.0145	<0.725	< 0.0362	<0.109			-		-			
	99 77'Wx10'Nx16'D	16'		<6.00			<0.0120	<0.600	< 0.0300	<0.0900	<0.120	< 0.0300	< 0.0300	<0.0600	<0.0600	<0.0600	<0.0600	
"	100 Oil Water Separator	Internal 7	Tank Liquio	ls - Refer to	Γable 4	-												
7/5/2017	101 Floor @ 16.5'	16.5'		<5.49			<0.0110	< 0.0549	<0.0274	<0.0823	<0.110	< 0.0274	< 0.0274	< 0.0549	< 0.0549	< 0.0549	< 0.0549	
"	102 S Wall @ 14'	14'	-	367			< 0.0164	<0.0821	< 0.0411	<0.123	<0.164	< 0.0411	< 0.0411	0.117	<0.0821	<0.0821	<0.0821	
"	103 25'N x P19 @ 10'	10'		12,300		-	<0.222	<1.110	18.3	46.5	25.7	< 0.555	< 0.555	11.4	<1.110	136	46.6	
"	104 16' x 10'N x 108'W	16'		<7.06		-	<0.0141	< 0.0706	< 0.0353	<0.106	<0.141	< 0.0353	< 0.0353	< 0.0706	< 0.0706	< 0.0706	<0.0706	
	105 15' bgs (above 104)	15'		14,800		-	< 0.304	<1.52	14.3	<2.280	25.2	<0.760	< 0.760	15.4	<1.520	4.81	<1.520	
7/6/2017	106 10'Nx3'Wx11' Pit	11'		614			< 0.0112	< 0.056	<0.028	<0.084	<0.112	<0.028	<0.028	0.523	<0.056	< 0.056	<0.056	5.99
"	107 25'Nx84'Wx16'	16'		10.9			0.0549	< 0.0624	< 0.0643	< 0.0936	<0.125	< 0.0312	< 0.0312	< 0.0624	< 0.0624	< 0.0624	< 0.0624	
"	108 25'Nx95'Wx16'	16'		7.66			0.0382	< 0.0669	0.0402	<0.100	<0.134	< 0.0335	< 0.0335	< 0.0669	< 0.0669	< 0.0669	< 0.0669	
"	109 45'Nx83'Wx16'	16'		<7.17			< 0.0143	<0.0717	<0.0358	<0.107	<0.143	< 0.0358	<0.0358	<0.0717	< 0.0717	0.0739	< 0.0717	
"	110 67'Nx50'Wx16'	16'	-	150			0.0277	< 0.0739	0.0959	<0.119	<0.159	< 0.0396	< 0.0396	0.131	< 0.0793	0.146	< 0.0793	
7/7/2017 <sup>2</sup>	111a 50'Nx110'Wx15.5'	15.5'		<8.12		-	< 0.0162	< 0.0812	< 0.0406	<0.122	<0.162	< 0.0406	< 0.0406	<0.0812	< 0.0812	<0.0812	<0.0812	
"	112a 50'Nx115'Wx13'	13'		<6.63			< 0.0133	< 0.0663	< 0.0332	<0.0995	<0.133	< 0.0332	< 0.0332	< 0.0663	< 0.0663	< 0.0663	< 0.0663	1.77
	113a N Side Toe @15'	15'		<6.82		-	< 0.0136	<0.0682	< 0.0341	<0.102	<0.136	< 0.0341	< 0.0341	<0.0682	<0.0682	<0.0682	<0.0682	
7/24/2017	111 10'E @ 2'bgs (office)	2'		<20	<25	<100	<0.200	<0.200	<0.200	<0.400	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	
"	112 15'E @ 14.5'bgs (office)	14.5'	-	<20	<25	<100	<0.200	<0.200	<0.200	<0.400	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	
"	113 30'E @ 15'bgs (office)	15'		<20	<25	<100	< 0.200	<0.200	<0.200	<0.400	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	
	114 N of T1 Fill @ P.L. @14'	14'		9,390	<25	<100	< 0.200	<0.200	28.5	27.2	47.6	<0.200	<0.200	5.62	<0.200	62.7	1.81	<9
"	115 15'N x 12'E x 13'	13'		<20	<25	<100	< 0.200	<0.200	<0.200	<0.400	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	
RBDM exposure	e limits for Occupational Users <sup>3</sup>			130	>Max	>Max	0.10	490	0.90	100	0.34	5.6x10 <sup>-4</sup>	0.013	57,000	0.54	12	110	30
RBDM exposure	limits for Construction Workers			9,700	4,600	11,000	380	77x10 <sup>4</sup>	17,000	56x10⁴	16,000	9.0	200	27,000	12,000	2,900	2,900	30
RBDM exposure	limits for Excavation Workers			>Max	>Max	>Max	11,000	28,000	49,000	20,000	580	250	5,600	750,000	320,000	81,000	81,000	800

#### Notes:

"B" means benzene

"T" means toluene "EDC" means 1,2-Dichloroethane

"E" means ethylbenzene "X" means xylenes

"EDB" means Ethylene Di-Bromide

"iso-PB" means iso-propylbenzene "n-PB" means npropylbenzene

"MTBE" means methyl tert-butyl ether

"1,2,4-TMB" means 1,2,4-Trimethylbenzene "1,3,5-TMB" means 1,3,5-Trimethylbenzene "N" means Naphthalene Red indicates result is above regulatory cleanup limit Blue - lab detection limit is above regulatory cleanup limit

"--" means not tested

Footnote 1 Full scan of VOC reports 64 compounds. No chlorinated solvents or non-petroleum chemicals detected. Refer to Apex Lab Report # A7F0761 for complete list of individual compounds.

Footnote 2 Samples numbers 111, 112 and 113 were accidentally used twice. To maintain unique sample IDs, those collected on 7/7/2017 have been designated by addition of "a" .

Footnote <sup>3</sup> Most strigent pathway for Occupational Users is "Leaching to Groundwater".

Table 3 - Soil Cleanup Analytical Results

Date Collected	Ť	Sample ID and Location	Depth in	NWTPH	NWTPH-Dx		Volatile Organic Compounds (VOCs)											
			Feet	-Gx	Diesel	Oil	В	T	Е	Х	N	EDB	EDC	iso-PB	MTBE	1,2,4-TMB	1,3,5-TMB	Lead
										milli	grams per kild	ogram (mg/K	g)					
7/26/2017	116	3'N x 1'W x 13'	13'	174	<25	<100	<0.200	<0.200	<0.200	<0.400	1.28	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	
	117	Floor @ 16'	16'	<20	185	<100	<0.200	<0.200	<0.200	<0.400	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	
	118	Wall @ 10'	10'	<20	<25	<100	<0.200	<0.200	<0.200	<0.400	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	
"	119	30'E @ 8'	8'	<20	<25	<100	<0.200	<0.200	<0.200	<0.400	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	
	120	15' E @ 8'	8'	<20	<25	<100	<0.200	<0.200	<0.200	<0.400	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	<0.200	
9/19/2017	121	Pit Water	Refer to Ta	able 4														
	122	2' Adams St N	2'	<6.00			< 0.012	< 0.030	<0.060	<0.0901								
"	123	3' Adams St M	3'	<4.92			<0.00985	<0.0246	< 0.0492	< 0.0739								
	124	3' Adams St S	3'	<5.55			<0.0111	< 0.0272	< 0.0555	< 0.0832								
"	125	2' W 6th Ave E	2'	<5.03			<0.0101	<0.0252	< 0.0503	< 0.0755								
"	126	2.5' W 6th Ave E	2.5'	<4.97			< 0.00995	< 0.0249	< 0.0497	< 0.0746								
"	127	1.5' W 6th Ave M	1.5'	<6.62			< 0.0132	< 0.0331	< 0.0662	< 0.0994								
"	128	1.5' W 6th Ave W	1.5'	<6.32			< 0.0126	<0.0316	< 0.0632	< 0.0947								
"	129	2.5' Blair S	2.5'	5.78			< 0.0116	<0.0289	< 0.0578	< 0.0867								
"	130	1.25' Blair M	1.25'	<4.45			<0.0089	<0.0223	<0.0445	<0.0668								
	131	2' Blair N	2'	<5.49			<0.0110	< 0.0274	< 0.0549	<0.0823								
"	132	1.5' V. Lot W	1.5'	<5.78			<0.0116	<0.0289	<0.0578	<0.0868								
"	133	1.25' Restroom	1.25'	<5.37			<0.0107	<0.0268	< 0.0537	<0.0805								
"	134	1.5' Office	1.5'	<5.81			<0.0116	<0.0291	<0.0581	<0.0872								
RBDM exposure limits for Occupational Users <sup>1</sup> 130 >Max >Max					>Max	0.10	490	0.90	100	0.34	5.6x10 <sup>-4</sup>	0.013	57,000	0.54	12	110	30	
		for Construction Workers		9,700	4,600	11,000	380	77x10 <sup>4</sup>	17,000	56x10 <sup>4</sup>	16,000	9.0	200	27,000	12,000	2,900	2,900	30
RBDM exposure	e limits	for Excavation Workers		>Max	>Max	>Max	11,000	28,000	49,000	20,000	580	250	5,600	750,000	320,000	81,000	81,000	800

#### Notes:

"B" means benzene "EDB" means Ethylene Di-Bromide "T" means toluene "EDC" means 1,2-Dichloroethane "E" means ethylbenzene "iso-PB" means iso-propylbenzene

"X" means xylenes "n-PB" means n-propylbenzene

"1,3,5-TMB" means 1,3,5-Trimethylbenzene

"N" means Naphthalene

"MTBE" means methyl tert-butyl ether

"1,2,4-TMB" means 1,2,4-Trimethylbenzene

Red - test result is above regulatory cleanup limit Blue - lab detection limit is above regulatory cleanup limit

Page 5 of 5

"--" means not tested

Table 4 - Pit Water & O/W Seperator Liquids Analytical Results

Astro 207 in Eugene, OR

Date	Sample ID and Location		NWTPH	NWT	NWTPH-Dx Volatile Organic Compounds (VOCs)										Total		
Collected			-Gx	Diesel	Oil	В	Т	Е	Х	N	EDB	EDC	MTBE	1,2,4-TMB	1,3,5-TMB	iso-PB	Lead
micrograms per liter (ug/L)																	
04/20/17	45	Pit Water	10,800	812	<151	181	11.8	311	200	143	<5.00	<5.00	<10.0	220	41.1	24.1	
05/04/17	87	Sheen only on Pit Water <sup>5</sup>	696x10 <sup>6</sup>														
"	87	Pit Water Only	10,700			<1.0	<1.0	4	33	432	<1.0	<1.0	<1.0	394	78	13	
06/26/17	87a <sup>6</sup>	Pit Water Only	<100	406	<381	<0.200	<1.00	<0.500	<1.50	<2.00	<0.500	<0.500	<1.00	<1.00	<1.00	<1.00	2.98
06/30/17	100	Oil Water Separator <sup>1</sup>	1,380	73,800	584,000												
09/19/17	121	Pit Water	2,000			1.3	1.39	17.7	1.88	24.3	<0.500	<0.500	<1.0	1.71	8.59	5.37	
RBDM limits	pational Users <sup>2</sup>	450	430	430	2,800	S3	8,200	23,000	11,000	590	3,900	870k	>S	>S	>S	NV⁴	
RBDM limits	of Excava	vation Workers <sup>2</sup> 14,000 s <sup>3</sup> s <sup>3</sup> 1,800 220,000 4,500 >S 500 27 630 160k 50,000 36,000 51,000						>\$									
RBDM limits for Urban Residential Users <sup>2</sup>			110	100	100	510	S3	1,500	86,000	2,000	110	700	63,000	500	0.066	<b>&lt;</b> S	NV <sup>4</sup>

#### Notes:

"B" means benzene "EDB" means Ethylene Di-Bromide "T" means toluene "EDC" means 1,2-dichloroethane "E" means ethylbenzene "MTBE" means methyl tert-butyl ether "X" means xylenes "1,2,4-TMB" means 1,2,4-Trimethylbenzene "N" means Naphthalene

"1,3,5-TMB" means 1,3,5-Trimethylbenzene

Footnote 1 Sample is internal tank liquids (not groundwater) - Test results in micrograms per liter (ug/L)

RCRA 8 Metals	Ag	As	Ba	Cd	Cr	Hg	Se	Pb
Oil Water Separator	<0.200	14.1	122	0.933	12.3	0.122	1.32	44.2

Footnote<sup>2</sup> RBDM pathways exclude Ingestion & Inhalation from Tap Water Notes:

Footnote 3 Limit exceeds solubility meaning RBDM limit applies to free product only Footnote 4 Chemical is considered Non-Volatile for purpose of these calculations

Sample 87 - foamy floating sheen was seperated from water portion at Apex lab Footnote 5

Indicates data was revised or added by MSBA on April 8, 2025 following data review Yellow Highlight

"iso-PB" means iso-propylbenzene

Red indicates result is above regulatory cleanup limit Blue - lab detection limit is above regulatory cleanup limit

"--" means not tested

>S means groundwater RBC exceeds the Solubility limit